

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

FOREST LABORATORIES, LLC and	)	
FOREST LABORATORIES HOLDINGS, LTD.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 14-1119 (SLR) (SRF)
	)	<b>CONSOLIDATED</b>
SIGMAPHARM LABORATORIES, LLC, et al.	)	
	)	
Defendants.	)	

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FOREST LABORATORIES, LLC and	)	
FOREST LABORATORIES HOLDINGS, LTD.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 15-430 (SLR)
	)	
AMNEAL PHARMACEUTICALS, LLC,	)	
AMNEAL PHARMACEUTICALS OF	)	
NEW YORK, LLC and	)	
AMNEAL PHARMACEUTICALS CO.	)	
INDIA PVT. LTD.,	)	
Defendants.	)	

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**JOINT STIPULATION AND ORDER**

IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, that C.A. No. 15-430 (SLR) is consolidated with C.A. No. 14-1119 (SLR) (SRF) (previously consolidated) for all purposes. In order to facilitate consolidation, the Scheduling Order entered by the Court in C.A. No. 14-1119 (SLR) (SRF) (D.I. 21) is hereby amended as follows. The parties further request that the Court reschedule the claim construction hearing for late November, subject to the Court's availability. All other dates remain unchanged. All documents shall be filed in C.A. No. 14-1119 (SLR) (SRF).

<b>Event</b>	<b>Original Date</b>	<b>Amended / New Date</b>
Fed. R. Civ. P. 26(a)(1) disclosures between Forest and Amneal	N/A	September 25, 2015
Disclosures pursuant to paragraph 3 of the Default Standard between Forest and Amneal	N/A	September 25, 2015
Plaintiffs to identify accused product(s), as well as asserted patent(s) the accused product(s) allegedly infringe(s) and produce file histories to Amneal	N/A	September 25, 2015
Amneal identifies any claim terms in need of construction along with their respective proposed constructions	N/A	September 23, 2015
Amneal to produce its complete ANDA	N/A	September 25, 2015
Plaintiffs and Amneal shall simultaneously serve and file opening claim construction briefs, limited to 6 pages, addressing any claim terms in need of construction in the '476 patent	N/A	October 6, 2015
Plaintiffs to produce an initial claim chart to Amneal	N/A	October 16, 2015
Expert discovery related to opening claim construction briefs shall be completed	September 16, 2015	October 30, 2015
Amneal to produce initial invalidity contentions	N/A	November 16, 2015
Parties shall serve and file simultaneous responsive claim construction briefs	October 5, 2015	November 5, 2015

<b>Event</b>	<b>Original Date</b>	<b>Amended / New Date</b>
All motions to join other parties and/or to amend pleadings, between Plaintiffs and Amneal, shall be filed	N/A	November 30, 2015
Completion of paper and electronic document discovery, between Plaintiffs and Sigmapharm, Breckenridge, Hikma, and Alembic, to be completed	October 2, 2015	November 13, 2015
Completion of paper and electronic document discovery, between Plaintiffs and Amneal, to be completed	N/A	December 18, 2015
Expert discovery related to responsive claim construction briefs shall be completed	October 19, 2015	November 19, 2015
Claim Construction Hearing	October 30, 2015	November __, 2015

The parties anticipate that these scheduling modifications will facilitate consolidation of related case no. 1:15-cv-00430-SLR with the present action and allow all parties to participate in the Markman proceedings. The parties agree that the above modifications will not be used as a basis to seek a modification of the trial date.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Maryellen Noreika

Jack B. Blumenfeld (#1014)  
Maryellen Noreika (#3208)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
(302) 658-9200  
jblumenfeld@mnat.com  
mnoreika@mnat.com

*Attorneys for Plaintiffs*

SHAW KELLER LLP

/s/ Karen E. Keller

Karen E. Keller (#4489)  
Jeffrey T. Castellano (#4837)  
300 Delaware Avenue, Suite 1120  
Wilmington, DE 19801  
(302) 298-0700  
kkeller@shawkeller.com  
jcastellano@shawkeller.com

*Attorneys for Hikma Pharmaceuticals, LLC,  
Hikma Pharmaceuticals, PLC, and West-Ward  
Pharmaceutical Corp.*

/s/ Pilar G. Kraman

Karen L. Pascale (#2903)  
Pilar G. Kraman (#5199)  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801  
(302) 571-6600  
kpascale@ycst.com  
pkraman@ycst.com

*Attorneys for Alembic Pharmaceuticals Ltd.,  
Alembic Global Holding SA, and Alembic  
Pharmaceuticals, Inc.*

PHILLIPS, GOLDMAN & SPENCE, P.A.

/s/ John C. Phillips

John C. Phillips, Jr. (#110)  
Megan C. Haney (#5016)  
1200 North Broom Street  
Wilmington, DE 19806  
(302) 655-4200  
jcp@pgslaw.com  
mch@pgslaw.com

*Attorneys for Sigmapharm Laboratories, LLC*

BAYARD, P.A.

SMITH KATZENSTEIN & JENKINS LLP

/s/ Stephen B. Brauerman

Richard D. Kirk (#922)  
Stephen B. Brauerman (#4952)  
Vanessa R. Tiradentes (#5398)  
Sara E. Bussiere (#5725)  
222 Delaware Avenue  
Suite 900  
P.O. Box 25130  
Wilmington, DE 19899  
(302) 655-5000  
rkirk@bayardlaw.com  
sbrauerman@bayardlaw.com  
vtiradentes@bayardlaw.com  
sbussiere@bayardlaw.com

*Attorneys for Breckenridge Pharmaceutical,  
Inc.*

/s/ Neal C. Belgam

Neal C. Belgam (#2721)  
Robert K. Beste (#3931)  
1000 West Street, Suite 1501  
P.O. Box 410  
Wilmington, DE 19899  
(302) 652-8400  
nbelgam@skjlaw.com  
rbeste@skjlaw.com

*Attorneys for Defendants Amneal  
Pharmaceuticals, LLC, Amneal  
Pharmaceuticals of New York, LLC, and  
Amneal Pharmaceuticals Co. India PVT. LTD.*

SO ORDERED this \_\_\_\_\_ day of September, 2015.

\_\_\_\_\_  
United States District Judge